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January 29, 2020

**VIA EMAIL ONLY**

Christopher J. Eibeler, Esq.  
Smith Eibeler, LLC  
101 Crawfords Corner Road, Suite 1-105R  
Holmdel, NJ 07733

Re: Christopher D. Adams vs. SCCY Industries, LLC

Dear Mr. Eibeler:

I am in receipt of your January 28<sup>th</sup> letter demanding that I identify the information which is subject to attorney-client privilege by today and demanding that I sign a tolling agreement today and informing me that my failure to comply will be deemed a waiver of my clients' rights.

My clients have no obligation to respond by your unilateral deadline, and they are not waiving any rights that they have against your client. My clients expressly reserve any and all rights to pursue any and all claims that they have against your client.

As Mr. Adams knows, the timing of delivery of his demand was to coincide when my client was out of the state. I will not have a chance to meet with him prior to your deadline. If you feel that you have to file a lawsuit before I can respond to you with a substantive conversation regarding my clients' counterclaims in due course next week, even though the relevant date is February 18<sup>th</sup>, then I recommend that Mr. Adams removes any reference to anything that he learned in an attorney capacity and to any privileged work product. Mr. Adams held himself out and was paid as an experienced legal counsel. So, he should know what information about his former client was privileged or not without my client's recommendation.

Sincerely,

**John P. Ferguson**

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